

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Section 73.622(i),)	MB Docket No. 18-126
Digital Television Broadcast Stations)	RM-11800
(Bridgeport and Stamford, Connecticut))	

To: Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary

Attn: Chief, Video Division, Media Bureau

REPLY COMMENTS OF CONNECTICUT PUBLIC BROADCASTING, INC.

These reply comments are filed on behalf of Connecticut Public Broadcasting, Inc. ("CPBI"), licensee of noncommercial educational Station WEDW, Bridgeport, Connecticut. CPBI is the proponent of the proposal set forth in the above-captioned Notice of Proposed Rule Making to change WEDW's community of license from Bridgeport to Stamford, Connecticut.¹ On August 6, 2018, CPBI filed the required comments, incorporating by reference its previous pleading and restating its present intention to promptly apply for a change of community of license when the requested change to the Table of DTV Allotments is made and to promptly implement that change,

¹ The Notice of Proposed Rule Making (NPRM) was published in the Federal Register on July 6, 2018, 83 FR 31516, establishing a reply comment date of August 20, 2018, and so these supporting comments are timely filed.

as required by paragraph 6 of the NPRM.² PMCM TV, LLC also submitted comments in response to the NPRM.³

CPBI believes the Commission can conclude that the public interest would be served by reallocating channel 49 from Bridgeport, Connecticut to Stamford, Connecticut, and modifying the construction permit for WEDW(TV) accordingly. The record supports a determination that the reallocation will result in a preferential arrangement of allotments. The reallocation would provide Stamford, the third-largest city in Connecticut and the seventh largest city in New England, with its first local television service. Bridgeport, Connecticut would continue to have a local television service through the operation of commercial Station WZME, which shares the WEDW channel and facility

² This paragraph 6 states that, in comments to support a proposed allotment, the proponent "should also restate its present intention to apply for the channel if it is allotted and, if authorized, to build a station promptly." CPBI believes that, because this is not a new channel requiring such an application, the Bureau meant to refer instead to the expectation that CPBI would restate its interest in operating Station WEDW as a Stamford station and in modifying the license for Station WEDW to reflect that the station's community of license is Stamford, Connecticut, without further application by CPBI.

³ "Comments of PMCM TV, LLC" were filed in RM-11800 on August 6, 2018. While not properly filed, and apparently also not served on CPBI or its counsel, CPBI will address them. PMCM notes that CPBI has been granted a modification construction permit for Station WEDW, as permitted in the second window that allowed expanded facilities for television stations following the incentive auction (see FCC File No. 00000034869, granted December 1, 2017), and that CPBI has filed a new DTS application to improve the operations of WEDW and its sharee station WZME (FCC File No. 0000036047). PMCM argues that the combination of these applications and this instant proceeding "raises broad issues regarding the Section 307(b) implications of the Commission's DTS procedures." In the context of this proceeding, PMCM's arguments about coverage issues are misplaced, without merit, and should be rejected. PMCM inappropriately seeks to couple the requested change in the Table of DTV Allotments with the wholly separate proceedings relating to WEDW's facilities. The December 1, 2017 construction permit grant is no longer subject to reconsideration or appeal and is therefore final. The change in community of license requested in this proceeding is a separate matter from that permit and was not required for its grant. Further, the Commission will consider the pending DTS application in due course on its own merits, and that application also has no bearing on the instant request. PMCM also argues without support that the grant of a construction permit for WEDW requires reimposition of the freeze on petitions to change communities of license. Cognizant of the prior grant of the permit, however, the Bureau noted at footnote 5 of the NPRM that a CPBI's requested waiver of the previously-existing freeze "is no longer necessary." Finally, this proceeding is not the proper forum to consider PMCM's argument regarding the Commission's DTS procedures; PMCM should instead file a Petition for Rulemaking to seek consideration of those issues.

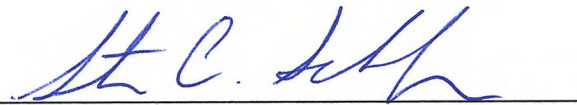
as a successful license relinquishment bidder in the broadcast incentive auction. Moreover, the requested change in community of license does not involve any technical changes to the presently authorized facilities of WEDW/WZME.

In light of the foregoing, the Commission should conclude that (1) CPBI's proposal results in a preferential arrangement of television allotments under section 307(b) of the Act and the Commission's allotment priorities, (2) the Table of Allotments should be amended as proposed, and the license for Station WEDW should be modified as requested.

Respectfully submitted,

CONNECTICUT PUBLIC BROADCASTING,
INC.

By: _____



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Date: August 20, 2018

CERTIFICATE OF SERVICE

I, Cindy Lloyd, certify that a copy of the attached Reply Comments Of Connecticut Public Broadcasting, Inc. was sent August 20, 2018, by first class mail, postage prepaid to the following:

Richard Morena
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Cindy Lloyd